

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE LOCAL
295/LOCAL 851 – IBT EMPLOYER GROUP
PENSION TRUST FUND and the BOARD OF
TRUSTEES OF THE LOCAL 295/LOCAL 851
– IBT EMPLOYER GROUP WELFARE
FUND,

Plaintiffs,

-against-

JRS TRUCKING SERVICES, INC.,

Defendant.

Civil Case No. 12-cv-08031 (WHP)

Electronically Filed

PLAINTIFFS' STATEMENT OF DAMAGES FOR JUDGMENT BY DEFAULT

Unpaid Contributions Due to the Local 295/851-IBT Employer Group Welfare Fund for the period of February through September of 2012	\$384,285.00
Unpaid Contributions Due to the Local 295/851-IBT Employer Group Pension Fund for the period of January through September of 2012	\$212,902.75
Interest accrued on the contributions owed to Local 295/851-IBT Employer Group Welfare Fund for the period of February through September of 2012 at a rate of 8.25% as of February 25, 2013	\$23,223.89
Interest accrued on the contributions owed to the Local 295/851-IBT Employer Group Pension Fund for the period of January through September of 2012 at a rate of 8.25% as of February 25, 2013	\$12,290.42
Liquidated Damages of 20% of Unpaid Contributions	\$119,437.55
Attorneys' Fees as of February 25, 2013	\$27,193.75
Costs and Disbursements: Clerk's Fee - \$350.00 Service Fee - \$127.50	\$477.50
TOTAL	\$779,810.86